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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

17 DAN CARLTON, an individual

18 Case No. **2:22-cv-02030-WBS-DB**

19 Plaintiff,

20 v.
21 STIPULATION AND ORDER
22 AMGUARD INSRUANCE COMPANY, a
23 foreign corporation; and DOES 1 to 100,
24 inclusive,
25 Defendants.

26 HEARING DATE: May 28, 2024
27 HEARING TIME: 1:30 p.m.
28 COURTROOM: 5 - 14th floor

18 Plaintiff Dan Carlton (“Plaintiff”) and Defendant Amguard Insurance Company
19 (“Defendant”) by and through their respective counsel, hereby stipulate and request the Court to
20 approve their agreement for an extension of time for the opposition and reply to defendant’s
21 motion for Summary Judgment filed on March 1, 2024.

22 Pursuant to Stipulation between the parties, on January 4, 2024, this Honorable Court
23 issued a Scheduling Order setting forth March 1, 2024, as the last day for the filing of motions in
24 this matter, and on March 1, 2024, Defendant filed and served its motion. Pursuant to the Local
25 Rule 230 (Fed. R. Civ. P. 78) the deadline for filing an opposition to the Motion for Summary
26 Judgment would be March 15, 2024, and the reply would be due on March 25, 2024.

1 For reasons including the complexity of the issues, the illness of plaintiff's counsel,
2 defendant's difficulty locating and producing documents in connection with depositions taken in
3 December which defendant has promised to produce this week, and the press of other time-
4 sensitive matters, the parties desire and stipulate to mutual extension of the deadlines to file the
5 opposition to the motion for summary judgment and defendant's reply.

6 The parties respectfully request that the Court approve their stipulation and extend the
7 deadline for the filing of the Opposition to the Motion for Summary judgment by three weeks to
8 and including **April 5, 2024**; and extend the time for the filing of a Reply to the Opposition by
9 three weeks, to and including **May 6, 2024**.

10 **ATTESTATION**

11 Concurrence in the filing of this document has been obtained from each of the individual(s)
12 whose electronic signature is attributed below.

13 Dated: March 5, 2024

MURPHY AUSTIN ADAMS SCHOENFELD LLP

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15 By:

ALEXANDER F. STUART
Attorneys for Plaintiff
DAN CARLTON



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19 Dated: March, 2024

20 WILSON, ELSER, MOSKOWITZ, EDELMAN &
21
22 DICKER, LLP

23 By:/s/ *John H. Podesta*

24 JOHN H. PODESTA
Attorneys for Defendant
AMGUARD INSURANCE COMPANY

ORDER

IT IS HEREBY ORDERED THAT:

1. The Stipulation is approved;
2. The briefing scheduling on the Motion for Summary Judgment which was filed on March 1, 2024, is as follows:

Plaintiff's Opposition to Motion for Summary Judgment is due **April 5, 2024**;

Defendant's Reply to the Opposition to Motion for summary Judgment is

due **May 6, 2024**.

Dated: March 5, 2024

William W. Shubbe

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE